SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

525 EAST BAY STREET, SUITE 200 CHARLESTON, SC 29403-6655 Facsimile 843-414-7039

June 18, 2020

Via Electronic Filing

C. Jo Anne Wessinger Hill Legal Counsel to the Commission Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

In Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges, Docket No. 2020-125-E; see also Docket Nos. 2020-106-A; 2017-370-E; 2017-305-E; and 2017-207-E

Dear Ms. Wessinger Hill,

The Southern Environmental Law Center ("SELC") submits this letter in response to your email dated June 5, 2020 requesting comments on a procedural schedule for the next Dominion Energy South Carolina ("DESC") rate case. SELC anticipates representing nonprofit organizations in this proceeding, including the South Carolina Coastal Conservation League ("CCL").

As an initial matter, we are concerned that the abbreviated timeline for this proceeding and the 20-day deadline for discovery responses (as established under S.C. Code Regs. 103-833) will not allow sufficient time for parties to conduct a robust discovery process and prepare for filing of direct or surrebuttal testimony. We request that the Commission, for the purposes of this proceeding, establish an abbreviated 10-day deadline for parties to respond to written interrogatories and requests for production.

Assuming that DESC files its rate case application on August 14, 2020, we propose that the Commission adopt the following schedule:

- 1. DESC must prefile its direct testimony and exhibits on or before **August 28, 2020**.
- 2. Other parties of record and ORS must prefile direct testimony and exhibits on or before **November 10, 2020**.
- 3. DESC must prefile its rebuttal testimony and exhibits on or before **November 30, 2020**.
- 4. Parties must submit all discovery requests on or before **December 1, 2020**.
- 5. Other parties of record and ORS must prefile any surrebuttal testimony and exhibits on or before **December 15, 2020**.

We believe the above schedule will allow the greatest fairness to all parties given the abbreviated schedule in this proceeding.

Lastly, we recommend that the Commission require that DESC update its test period results for the historical test period (January 1, 2019 thru December 31, 2019) for known and measurable changes as of September 30, 2020.

Sotok

Kate Lee

STATE OF SOUTH CAROLINA BEFORE THE PUBLIC SERVICE COMMISSION DOCKET NO. 2020-106-A

In the Matter of: Actions in Response to COVID-19)))	CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) Southern Environmental Law Center's Comments on Procedural Schedule for DESC Rate Case 2020-125 filed on behalf of South Carolina State Conference of the NAACP, South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Upstate Forever by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Alexander W. Knowles Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 Email: aknowles@ors.sc.gov

Carri Grube Lybarker SC Department of Consumer Affairs Email: clybarker@scconsumer.gov

Frank R. Ellerbe III Robinson Gray Stepp & Laffitte, LLC 1310 Gadsden Street Columbia, SC 29201 Email: fellerbe@robinsongray.com

John M.S. Hoefer Willoughby & Hoefer, P.A. Post Office Box 8416 Columbia, SC 29202 Email: jhoefer@willoughbyhoefer.com

Katie M. Brown Duke Energy Progress, LLC 401 West Broad Street, Suite 690 Greenville, SC 29601 Email: katie.brown2@duke-energy.com Becky Swearingen AAA Utilities, Incorporated 3071 Highway 6 Lexington, SC 29073 Email: bletempt02@gmail.com

Charles L.A. Terreni Terreni Law Firm, LLC 1508 Lady Street Columbia, SC 29201 Email: charles.terreni@terrenilaw.com

Heather Shirley Smith
Duke Energy Carolinas, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
Email: heather.smith@duke-energy.com

K. Chad Burgess
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
Email:
Kenneth.burgess@dominionenergy.com

M. John Bowen Jr.
Burr & Forman LLP
Post Office Box 11390
Columbia, SC 29211
Email: jbowen@burr.com

Margaret M. Fox Burr & Forman LLP Post Office Box 11390 Columbia, SC 29211 Email: pfox@burr.com

Rebecca J. Dulin Duke Energy Carolinas, LLC 1201 Main Street, Suite 1180 Columbia, SC 29201 Email: Rebecca.Dulin@duke-energy.com

Samuel J. Wellborn Robinson Gray Stepp & Laffitte, LLC 1310 Gadsden Street Columbia, SC 29201 Email: swellborn@robinsongray.com

T. Richmond McPherson III
McGuire Woods LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202-2146
Email: rmcpherson@mcquirewoods.com

Matthew W. Gissendanner
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
Email:
matthew.gissendanner@dominionenergy.com
Roger P. Hall
South Carolina Dept. of Consumer Affairs
293 Greystone Blvd., Suite 400
Post Office Box 5757
Columbia, SC 29250

Scott Elliott Elliott & Elliott, P.A. 1508 Lady Street Columbia, SC 29201 Email: selliott@elliottlaw.us

Email: rhall@scconsumer.gov

Thadeus B. Culley Regional Director and Regulatory Counsel Vote Solar 1911 Ephesus Church Road Chapel Hill, NC 27517 Email: thad@votesolar.org

June 18, 2020

/s/ Emily E. Selden